

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

10CV6005(RWS)

Plaintiff,

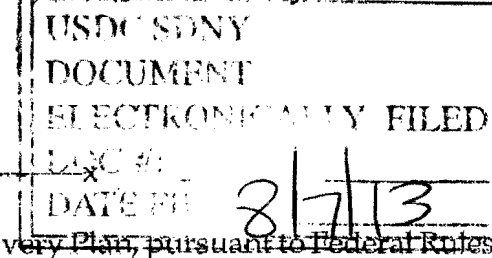
Rule 26(f)(3)

-against-

~~Amended Discovery Plan~~

THE CITY OF NEW YORK, et al.,

Defendants.



The parties submit the following Amended Discovery Plan, pursuant to Federal Rules of Civil Procedure Rule 26(f)(3).

1. The continued deposition of the plaintiff by Mauriello/City will be held on: August 26, 2013. The deposition of the plaintiff by the medical defendants shall be held on: August 27, 2013. Each deposition shall consist of a maximum of seven hours of actual testimony time.

2. The depositions of the defendants shall be held as follows. Each deposition shall consist of a maximum of seven hours of actual testimony time.

Party Witnesses

Date of deposition

Deputy Chief Michael Marino:

August 29, 2013

Deputy Inspector Steven Mauriello:

September 10, 2013

Captain Theodore Lauterborn:

TBA between September 30 and October 3

Lieutenant Timothy Caughey:

TBA between September 30 and October 3

Dr. Isak Isakov:

September 27, 2013

Dr. Aldana-Bernier:

September 20, 2013

Jamaica Hospital Medical Center:

Notice to be served by plaintiff for 30(b)(6) depositions

Each deposition shall consist of a maximum of seven hours of actual testimony time. Each party maintains the right to apply to the court for additional time if this is deemed necessary

by that party. It is further understood that these dates are subject to slight adjustments due to scheduling conflicts that may arise and due to the availability of witnesses.

3. Depositions of Non-Party witnesses by subpoena.

Non-Party Witnesses:

Date of Deposition

Catherine Lamstein Psy.D:

To be arranged (subpoena to be served by plaintiff)

Larry Schoolcraft

October 8, 2013 (subpoena to be served by City)

4. The handling of confidential and attorneys' eyes only confidential and/or privileged information continues to be controlled by the Stipulation and Protective Order and Attorneys' Eyes Only Stipulation and Protective Order so-ordered by the Court on October 3, 2012.

5. Local Rule 33.3(c) interrogatories seeking the claims and contentions of the opposing parties shall be served after the depositions of the parties are completed. Plaintiff will respond thereto within twenty days and defendants will respond within twenty days after the plaintiff's response.

6. Fact discovery shall be completed by December ~~20~~⁶, 2013.

7. Any expert disclosure not previously made, and the depositions of experts, shall be scheduled for the ~~three~~^{two} months after the fact discovery is completed. Plaintiff's expert disclosure shall be made by January ~~17~~³, 2014 and defendants' expert disclosure shall be made by February ~~18~~⁴, 2014. Depositions of plaintiff's expert(s) shall be completed by February 21, 2014 and depositions of defendants' experts shall be completed by March 5, 2014.

~~8. Expert discovery shall be completed by March 20, 2014.~~

9. Any dispositive motions shall be served by April ~~19~~⁵, 2014.

10. All dates in this discovery plan are subject to modification. It is expressly understood that the dates for expert discovery are preliminary and may change.

11. This document may be executed in counterparts, and signatures transmitted by facsimile or other electronic means shall have the same force and effect as if signed in the original.

Dated: New York, New York
July 31, 2013

*S. ordered
Sweet VSD
8.5.13*

Nathaniel B. Smith, Esq.
111 Broadway - Suite 1305
New York, New York 10006
212-227-7062 (tel)
natbsmith@gmail.com

Bruce M. Brady (BMB4816)
CALLAN, KOSTER, BRADY & BRENNAN, LLP
Attorneys for Defendant
DR. LILIAN ALDANA-BERNIER
1 Whitehall Street
New York, NY 10004-2140
(212) 248-0115
bbrady@ckbbllaw.com

Suzanna Publicker Mettham (SP1005)
Assistant Corporation Counsel
MICHAEL A. CARDOZO,
Corporation Counsel of the City of New York
Attorney for CITY defendants
Special Federal Litigation Division
New York City Law Department
(212) 788-1103
spublick@law.nyc.gov

Gregory J. Radomski (GJR2670)
MARTIN, CLEARWATER & BELL, LLP
Attorneys for Defendant
JAMAICA HOSPITAL MEDICAL CENTER
220 East 42nd Street
New York, NY 10017
(212) 697-3122
radomg@mcblaw.com

Walter A. Kretz, Jr. (WK-4645)
Scoppetta Seiff Kretz & Abercrombie
Attorneys for Defendant
Deputy Inspector Steven Mauriello
444 Madison Avenue, 30th Floor
New York, NY 10022
(212)-371-4500
wakretz@seiffkretz.com

Brian F. Lee (BL9495)
IVONE, DEVINE & JENSEN, LLP
Attorneys for Defendant
ISAK ISAKOV, M.D.
2001 Marcus Avenue, Suite N100
Lake Success, New York 11042
(516) 326-2400
brianelee@idjlaw.com